



April 27, 2010

Dear Ms. Kathleen Vokes:

On behalf of Bradford White Corporation, please accept our thanks for the opportunity to comment on the proposed water heater ENERGY STAR® program changes. Our comments are provided below for your review and consideration.

Bradford White Corporation (BWC) agrees it is critically important the ENERGY STAR brand maintain its value. This can only be accomplished through a robust certification and verification program. The product ratings must be accurate and the process transparent. Although secondary to accuracy, the process must also be accessible to all manufacturers without being overly burdensome or costly. It benefits no one if the new process is so complex and expensive as to discourage manufacturers from participating in the ENERGY STAR program.

Many manufacturers, including BWC, hold an ISO/IEC 17025 accreditation, which allows them to accurately perform efficiency testing in their facility. Bradford White is also a proud member of the Air-Conditioning, Heating, and Refrigeration Institute (AHRI). AHRI already maintains a rigorous, independent product efficiency certification and verification program with stringent acceptance and listing criteria.

The AHRI program is accepted by the DOE and California Energy Commission and has proven accurate and sustainable over many years. A manufacturer must list their entire product line, no exceptions, to participate in the program. Participating manufacturers must then supply complete test data prior to any specific model being listed in the AHRI directory. This data is reviewed by AHRI staff and the product listed only if the data sustains the ratings. A comprehensive audit of all listed models is then conducted through a third party, nationally accredited laboratory on a yearly basis. Typically, one third of the manufacturers' product line is tested each year through a third party random selection process. Lastly, the AHRI program has a clearly delineated challenge system.

Given the stringent AHRI listing/verification processes, BWC urges acceptance of this program for ENERGY STAR products. Provided the manufacturer has an ISO/IEC 17025 accredited test facilities and are a participant in the AHRI program, BWC believes the ENERGY STAR program would be best served by using the existing AHRI system. Mandating another system creates a needlessly redundant and costly hurdle without improving rating accuracy or the value of the ENERGY STAR brand.

For those manufacturers that choose not to participate in AHRI, BWC recommends pre-listing test data, from an ISO/IEC 17025 lab, be required prior to obtaining ENERGY STAR listing. The manufacturer would then be required to obtain independent verification testing, every three years, through a nationally accredited third party organization who would randomly select products from the manufacturers' facilities.

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BWC only sells water heaters through independent wholesale distributors. Although a complete list of ENERGY STAR products sold to each distributor can certainly be provided, BWC has no knowledge of, nor control over, what the distributor does with those products after delivery. A distributor in most instances has many branch locations throughout the nation or a specific region.

Once a product is received into distributor inventory, the product can be retained in central inventory or trans-shipped to a branch for sale to an installing plumber. The installer can then retain the water heater in inventory, or install it directly. Therefore, it is unknown, at any one time, what a distributor or installer will have in its possession. It cannot be known which distributor and installers will choose to stock new ENERGY STAR products when introduced. Typically, distributors will not stock specialty products, such as ENERGY STAR rated water heaters, preferring instead to special order from the factory as needed.

This then presents severe difficulty when trying to select water heaters from the wholesale distribution channel for verification. BWC highly recommends the AHRI selection model be used. In this system, the manufacturer is advised a selection will be made. An independent auditor visits the manufacturing location and randomly selects product from inventory, by model. These water heaters are then marked and sealed and the product delivered to an independent laboratory for testing. If the manufacturer does not arrange for the selection process in a timely manner, the auditing agency can then go to distribution in an attempt to obtain representative samples.

Again, Bradford White Corporation thanks you for this opportunity to comment on the Enhanced Testing and Verification proposed for the water heater ENERGY STAR program. We urge the EPA/DOE to modify the Enhanced Testing and Verification pursuant to our comments.

Respectfully submitted,

Bradford White Corporation

Michael W. Gordon
Vice President, Engineering

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